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INTER-OFFICE CORRESPONDENCE  
RICHMOND, VIRGINIA

To: . Distribution

Date: September 28, 1979

From: . W. R. McCoy

Subject: . Procedure for Handling 30-gallon Metal Drums for Disposal of Solid  
Hazardous Waste Material

In the fall of 1977, the Research Center contracted RAD Services, Inc. to dispose of hazardous chemical waste.<sup>1</sup> Part of this service involves the handling, by PM personnel, of 30-gallon metal drums. On March 15, 1978, a meeting was held with members of Charge Number 6906 and the stockroom personnel of the Administrative Services Division to clarify the logistics of handling waste disposal drums.<sup>2</sup> The meeting resulted in a protocol being proposed and accepted. Since that time, some of the handling procedures have been changed, discontinued, or otherwise modified. The purpose of this document is to update and further clarify the procedures and responsibilities for handling 30-gallon metal drums for disposal of hazardous waste material. The procedures and responsibilities were reviewed and agreed upon in consultation with all of the personnel affected by this protocol.

The current protocol is as follows:

1. RAD Services, Inc. will provide PM with 30-gallon drums to which vermiculite has been added to a depth of 3-4 inches. Also provided are top-sealing gaskets and nuts and bolts for securing tops to the drums. The R & D stockroom (Mr. Mark Davis or his designee) will provide plastic bags for the covering of full drums.
2. Empty drums, along with accessories described above, will be transferred from the stockroom area to the Tower storage area (outside storage on the north side of the Tower) by stockroom personnel. These materials will be stored in the Tower storage area for exclusive use by the members of Charge Numbers 6906 and 6908. In order to provide protection of accessories described above from the weather, a lidded plastic trash container is located in the storage area for these items.
3. A short ramp constructed of heavy gauge aluminum has been provided so that a cart can be moved in and out of the storage area. A laboratory cart, which will be used to transport the empty as well as the full drums, has been provided to 6906 and 6908 personnel. This cart is normally kept in the T-6 north chase when not in use.

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4. The door leading into the designated storage area will be padlocked. Keys to this lock will be retained by Mr. Davis, Mr. W. R. McCoy (who has been designated as having primary responsibility for coordination of toxic waste disposal operations in the Biochemical Research Division), and Mrs. Nancy Peters, Biochemical Research Division Secretary.
5. Members of Charge Numbers 6906 and 6908 will be responsible for the transportation of drums between their respective laboratories and the Tower storage area (for further details, see #9 below).
6. Once an empty drum is placed in the laboratory, it may remain there until it is filled. [However, as each drum is put into use, it will be marked "Caution Cancer Suspect Agent" and/or "Cancer Suspect Agent. Authorized Personnel Only." These self-adhesive, 6 x 11.5 cm labels are available from Mr. McCoy (T613).] Drums should be filled with solid waste only (petri dishes, pipettes, test tubes, etc.). Liquid waste should not be placed in these drums. This is in compliance with Department of Transportation (DOT) regulations. A detailed procedure for the handling of liquid hazardous waste material is in preparation.
7. Once a drum has been filled, the top, with sealing gasket in place, should be firmly secured. (The 6906/6908 personnel responsible for filling the drum are also responsible for sealing it.) Care should be taken to place the fastening bracket with nut and bolt in the "down" position (*i. e.*, below the top surface of the drum). Tools to assist in the performance of this operation are located in room T-613 (or see Mr. McCoy).
8. Members of Charge Numbers 6906 and 6908 will be responsible for the transportation of these full drums between their respective laboratories and the Tower storage area. The drum will be strapped to the laboratory cart (see paragraph 3 above) and transported by two people to the storage area. Transportation of drums on the Tower freight elevator will be accomplished with the drum movers having sole control of the elevator. This is done through the use of an elevator key, which will be retained by Mrs. Nancy Peters.
9. Upon exit through the Tower receiving door to the drum storage area, the receiving door must be closed. This is accomplished by arranging for mail room personnel to close the door after exit. To reenter the building, a signal bell, located adjacent to the outside of the receiving door, is pressed. Mail room personnel will then reopen the door.

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10. Once a full, labeled (see #6 above) drum has been placed in the designated storage area, it must be covered with a plastic bag. The bag will also be marked, "Caution Cancer Suspect Agent." This will no longer be required upon the installation of a roof over the storage area.
11. Mr. Davis is responsible for transporting the full drums from the designated Tower storage area to the stockroom receiving area for pickup by RAD Services personnel. Before these full drums are loaded onto the RAD Services truck, representatives of RAD Services, Inc. will mark these drums with a label, "Biological Agent." (They provide the label which serves to comply with government regulations concerning the currently acceptable method for transporting and disposal of such waste materials.)
12. Mr. Davis, only, will inform RAD Services, Inc. to arrange their schedule for a pickup of the full drums and/or the delivery of empty drums as necessary.

## References:

1. Thomson, R. N. Hazardous material waste disposal. Memo to Managers; 1977 October 27.
2. Kuhn, W. F. Waste disposal for Charge Number 6906. Memo to distribution; 1978 March 22.

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